



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
SR-6J

January 21, 1997

Gene Liu
U.S. Army Corps of Engineers
215 North 17th Street
Attn: CEMRO-ED-ED
Omaha, NB 68201-4978

RE: Comments on the Ninety Percent Design Package For Capping
the Taracorp Pile; NL Industries Superfund Site in Granite City,
Illinois


Dear Mr. Liu:

The United States Environmental Protection Agency (U.S. EPA) and
Illinois EPA (IEPA) have reviewed the Ninety Percent Design
package for capping the Taracorp pile at the NL Industries
Superfund Site in Granite City, Illinois. U.S. EPA comments are
included herein as Enclosure 1. The Illinois EPA comments, which
comprise Enclosure 2, must also be addressed.

The United States Army Corps of Engineers (U.S. ACE) must
incorporate all comments as written. Please contact me to
discuss any comments that will not be incorporated verbatim. The
U.S. ACE shall address the enclosed comments and submit a final
100% design document by February 28, 1997.

If you have questions or need clarification, you may contact
Sheri Bianchin at (312) 886-4745, or me at (312) 886-4742.

Sincerely,


Brad Bradley
Remedial Project Manager

Enclosures

EPA Region 5 Records Ctr.



257940

cc: Bob Rogers, Illinois EPA

bcc: S. Bianchin
L. Nachowicz

ENCLOSURE 1

U.S. EPA Comments on the Ninety Percent Design package for capping the Taracorp pile at the NL Industries Superfund Site in Granite City, Illinois

General Comments:

1. All property owners affected by the capping remedy (Taracorp, Rich Oil, BV&G Transport, Trust 454, Granite City Steel) must be contacted for input on this design package. Any potential problems must be quickly identified and resolved such that the final design can be fully implementable. Since Taracorp is the owner of the pile, their input is essential regarding the future use of the capped pile (type of vegetation, erosion control, etc.). U.S. EPA will contact the property owners to arrange these meetings, preferably during the first week of February; USACE will need to provide a design engineer for attendance at these meetings.
2. Add the following Disclaimer to the document. If the design plan in any way conflicts with the 1990 Record of Decision (ROD) or the 1995 Decision Document/Explanation of Significant Differences (DD/ESD), the ROD and DD/ESD shall govern.
3. Although IEPA has not submitted comments regarding alternative A since they were not given the alternative in a timely manner, their comments regarding alternative B also apply to the text and drawings for alternative A.
4. Provision for an implementation schedule must be included in the 100% design submittal.

Specific Comments:

5. **Page 1-1, Section 2, Purpose.** Add to the end of sentence as follows: . . . in accordance with the Record of Decision (ROD) and the Decision Document/ Explanation of Significant Differences (DD/ESD).
6. **Page 1-1, Section 3.2.** Add to the end of sentence as follows. . . and the DD/ESD.
7. **Page 1-2, Section 5.1.2.** Discuss further what regulatory actions are referred to here.
8. **Page 1-2, Section 5.1.3, Groundwater, Second sentence.** Rewrite the second sentence as follows: Groundwater monitoring data from wells adjacent to the site and collected subsequent to the Remedial Investigation have shown elevated concentrations (as compared to background) of . . . and lead.
9. **Page 1-2, Section 5.1.3, Groundwater.** Delete third sentence starting with [h]owever.

10. **Page 1-3, Section 5.2.3.** Add to the second sentence as follows: *Taracorp, then site-owner, . . .*

11. **Page 2-1, Section 1.1, First Bullet:** Rewrite as follows:

Alternative "A" consists of 1) constructing a RCRA-compliant cap over the existing Taracorp waste pile on the Taracorp property; and 2) constructing a separate RCRA-compliant cap over the other contaminated material from the Taracorp industrial site at the southern edge of the Trust 454 property. The other contaminated material includes the contaminated soil, and the SLLR pile, which will be consolidated and placed on a bottom liner. In order to minimize the impacts of the Taracorp Landfill cap extending onto adjacent properties, a concrete wall will be incorporated which will extend around the entire waste pile. The layout for Alternative A is depicted in the General Site Plan dated October 1996 (or most recent), drawing C-1, in the drawings for Alternative A.

Alternative "B" consists of constructing one-continuous RCRA-compliant cap over the Taracorp Pile and other consolidated contaminated materials adjacent to the Taracorp pile on the BV&G Transport property. The other consolidated contaminated materials will consist of contaminated soils from the Taracorp industrial properties and the SLLR pile which will be consolidated and placed on a bottom liner.

This cap will toe extend out to the existing ground surface in all areas around the site, except for the northern portion of the site. In this area, a concrete wall will be incorporated so as to avoid impact to the Taracorp and BV&G Transport office buildings, railroad tracks, and local roadways.

The layout for Alternative B is depicted in the General Site Plan dated October 1996 (or most recent), drawing C-1, in the drawings for Alternative B.

U.S. EPA shall select either "Alternative A" or "Alternative B" based upon property access issues and logistics.

FINAL DESIGN ANALYSIS

12. **Page 2-1, Section 1.1, Fourth Bullet.** Add to the sentence as follows: *For aesthetics, and in accordance with public concern, . . .*

13. **Page 2-1, Section 1.1, Seventh Bullet:** Add to the end of the first sentence as follows . . . on-site in accordance with the selected alternative.

14. **Page 2-1, Section 1.1, last bullet point.** The beginning of this sentence should read as follows: "All unpaved areas within the industrial area will be excavated to 1000 ppm lead or three feet, whichever occurs first, to reach..." Determination of 1000 ppm lead, where applicable, should be done using an XRF for screening, and then followed up with lab results.

15. **Page 2-3, Section 3.1.1, first sentence.** Insert "1000 ppm lead or" between "of" and "three" and add "whichever occurs first" at the end of the sentence.

16. **Page 2-4, Section 3.2.2.1, first sentence.** Add "including native species/prairie plant " at the end of this sentence. This plan shall be developed in accordance with the document Revegetation of Superfund Sites with Native Plant: A Primer for Superfund Personnel, December 1996 (or most recent), and Beneficial Landscape Practice Guidance published in the Federal Register on August 10, 1995.

17. **Page 2-4, Section 3.2.2.1.** A separate vegetative cover implementation plan shall be required to be submitted to U.S. EPA for approval at least two months prior to completion of the cap.

18. **Page 2-4, Section 3.2.2.1.** Add to the end of the first sentence as follows: . . . including native species and prairie plants.

19. **Page 2-5, Section 3.2.2.3.3.** Testing requirements (parameters and frequency) for fill material must be added to this section.

20. **Page 2-9, Section 3.2.2.6.3.1, last sentence.** Fill in the appendix reference here.

21. **Page 2-11, Section 3.6.1.** Delete first sentence.

22. **Page 2-12, Section 3.6.3.** Replace the word "grass" with "vegetative".

23. **Page 2-31, Section 9.3.1.2.** Replace "2 days" with "1 day".

APPENDICES

24. **Appendix A.** Add the DD/ESD (Enclosure 3.

DRAWINGS

25. **Alternative A and Alternative B: Drawing C-17, Note 1.** State "1000 ppm lead or 3 feet, whichever occurs first".

26. **Alternative A and Alternative B: Drawing C-17, Note 3.** State that "all soil excavated below 3 feet must be tested for lead and can be used as fill only on the expanded Taracorp pile".

27. **Alternative A and Alternative B: Drawing C-18, Note 2.** State "1000 ppm lead or 3 feet, whichever occurs first".

28. **Alternative A, Drawing C-22 and Alternative B, Drawing C-21.** 447 feet and 446 feet, respectively are too high for the cap to extend. In response to public concern, EPA promised that the pile would not increase in height during the public comment period for the capping remedy; this promise must be adhered to in the design.

29. **Drawings, General Comment.** The fencing indicated on the drawings should extend only around the perimeter(s) of the capped pile (piles for Alternative A). Fencing further than the perimeter(s) of the pile(s) unnecessarily limits land use.

SPECIFICATIONS

30. **Page 01010-2, Section 5.3.** Combine these 15 documents into the following: Quality Assurance/Quality Control Project Plan, Site Safety and Health Plan, and Site Maintenance, Demobilization, and Project Completion Plan.

31. **Page 01310-1.** The following provisions must be added to this section:

- a. Work will be shut down immediately if visible emissions are observed during intrusive activities involving lead-containing soils/wastes/debris,
- b. Weather limitations (maximum wind velocity, etc) must be established for the job,
- c. Dust control procedures will be reevaluated immediately in the event of any high readings on the perimeter air monitors, and
- d. A properly implemented "water shroud" will be allowed, if needed, to control dust emissions from the site during construction activities (see Enclosure 4 for some other possible dust control techniques/considerations).

32. **Page 01450-3, Section 3.1.1.2, second line.** Insert "at least" between "collecting" and "one".

33. **Section 02935.** Delete this section. Indicate that a separate

vegetative cover implementation plan shall be required to be submitted to U.S. EPA for approval at least two months prior to completion of the cap. This plan will provide for incorporating native vegetation/prairie plants.